

December 26, 2002

RE: DaimlerChrysler Corp. New Castle Machining & Forge Plt 065-14159-00001
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**DaimlerChrysler Corporation New Castle Machining & Forge Plant
1817 "I" Avenue
New Castle, Indiana 47362**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 065-14159-00001	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 26, 2002 Expiration Date: December 26, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary automotive parts manufacturing source.

Authorized Individual:	Plant Manager
Source Address:	1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address:	1817 "I" Avenue, New Castle, Indiana 47362
General Source Phone Number:	(765) 521-1655
SIC Code:	3714
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) boilers, firing natural gas, using No.2 fuel oil as backup, identified as B-1, B-2 and B-3, installed in 1999, rated at 36 million British thermal units per hour, each.
- (b) One (1) shot blasting operation, identified as N-3, installed in 1973, equipped with a bag-house, exhausting through Stack 500, capacity: 5,762 pounds of metal parts per hour.
- (c) One (1) shot blasting operation, identified as N-22, installed in 1994, equipped with a bag-house, exhausting through Stack 22, capacity: 4,276 pounds of metal parts per hour.
- (d) Two (2) tool sharpening areas, identified as N-20 and N-21, installed in 1940, equipped with two (2) rotoclones, exhausting through Stacks 31 and 32, capacity: 94 pounds per hour, each.
- (e) One (1) piston pin packer, identified as N-31, installed in 1986, consisting of four (4) sub-stations, exhausting through Stack 20, capacity: 2,500 parts per hour.
- (f) One (1) parts washer, identified as N-32, installed in 1988, exhausting through Stack 6, capacity: 0.2 gallons per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.[326 IAC 6-3-2]
- (c) Quenching operations used with heat treating processes.[326 IAC 6-3-2]
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Lime silo (N-28), associated with the onsite WWTP. [326 IAC 6-3-2]
- (f) Forge/press shop QA/QC grinders (N-56 and N-57).[326 IAC 6-3-2]
- (g) Wet type machining operations. [326 IAC 6-3-2]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary or source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual"

as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades** [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios** [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP)

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt

corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Three (3) boilers, firing natural gas, using No.2 fuel oil as backup, identified as B-1, B-2 and B-3, installed in 1999, rated at 36 million British thermal units per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Nonapplicability

- (a) Condition D.1.1, from F 065-5619, issued December 12, 1996, the requirement to limit the use of natural gas to less than 900 million cubic feet per year, has not been included in the renewal. This requirement is no longer applicable because the source has removed all boilers except B-1, B-2 and B-3, and according to the latest AP-42 emission factors for NO_x emissions from natural gas combustion, the unrestricted potential to emit NO_x when burning natural gas is only 47.3 tons per year. Thus, Condition D.1.1 of F 065-5619 is hereby rescinded.
- (b) Condition D.1.7, from F 065-5619, issued December 12, 1996, the requirement to limit emissions of NO_x from the boilers and other insignificant fuel combustion facilities to less than 73.0 tons per year, has not been included in the renewal. This requirement is no longer applicable because the source has removed all boilers except B-1, B-2 and B-3, and according to the latest AP-42 emission factors for NO_x emissions from natural gas combustion, the boilers could burn natural gas 8,760 hours per year and still limit emissions from the entire source to less than one hundred (100) tons per year. Thus, Condition D.1.7 of F 065-5619 is hereby rescinded.

D.1.2 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 60 Subpart Dc.

D.1.3 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983), particulate emissions from the three boilers, identified as B-1, B-2 and B-3, shall in no case exceed 0.323 pounds of particulate matter per million British thermal units heat input.

D.1.4 Sulfur Dioxide (SO₂) [326 IAC 2-8-4] [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 2-8-4, the total input of No.2 fuel oil to the three boilers, identified as B-1, B-2 and B-3, shall be limited to less than 1,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.1.5 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1] [40 CFR 60.40c]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the three boilers, identified as B-1, B-2 and B-3, shall not exceed five tenths (0.5) pounds per million British thermal units heat input; or

- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (c) Pursuant to 40 CFR 60.43c (c), no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 30 million British thermal units per hour or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6 minute average), except for one 6 minute period per hour of not more than 27 percent opacity.

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and burning oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps

in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

D.1.11 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60.40c, Subpart Dc, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) shot blasting operation, identified as N-3, equipped with a baghouse, exhausting through Stack 500, capacity: 5,762 pounds per hour.
- (c) One (1) shot blasting operation, identified as N-22, equipped with a baghouse, exhausting through Stack 22, capacity: 4,276 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e), the allowable particulate from the one (1) shot blasting operation, identified as N-3, shall not exceed 8.33 pounds per hour when operating at a process weight rate of 5,762 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate from the one (1) shot blasting operation, identified as N-22, shall not exceed 6.82 pounds per hour when operating at a process weight rate of 4,276 pounds per hour.

These limitations are based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Particulate Matter (PM₁₀) [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions from the one (1) shot blasting operation, identified as N-3, shall not exceed 12.86 pounds per hour, equivalent to 56.3 tons per year.
- (b) Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions from the one (1) shot blasting operation, identified as N-22, shall not exceed 5.25 pounds per hour, equivalent to 23.0 tons per year.

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Prior to November 1, 2005, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM₁₀ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance

Testing.

D.2.5 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for particulate and PM10 control shall be in operation and control emissions from the two (2) shot blasting operations (N-3 and N-22) at all times that the two (2) shot blasting operations (N-3 and N-22) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of each shot blast stack exhaust (Stack 500 and Stack 22) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the shotblasting operations (N-3 and N-22), at least once per shift when the shotblasting operations (N-3 and N-22) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the shotblasting operations (N-3 and N-22) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of each shot blast stack exhaust once per shift when venting to the atmosphere.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
 - (1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) Two (2) tool sharpening areas, identified as N-20 and N-21, equipped with two (2) rotoclones, exhausting through Stacks 31 and 32, capacity: 94 pounds per hour, each.
- (e) One (1) piston pin packer, identified as N-31, consisting of four (4) substations, exhausting through Stack 20, capacity: 2,500 parts per hour.
- (f) One (1) parts washer, identified as N-32, installed in 1988, exhausting through Stack 6, capacity: 0.2 gallons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the total allowable particulate from the two (2) tool sharpening areas, identified as N-20 and N-21, shall not exceed 0.841 pounds per hour when operating at a total process weight rate of 188 pounds per hour.

The limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, (parts washer N-32, installed in 1988) the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.3 Nonapplicability of PM₁₀ Limitation

The requirement from F 065-5619, issued December 12, 1996, Condition D.3.2 which limited PM₁₀ emissions from the two (2) tool sharpening areas to less than 0.307 tons per month has not been included in the renewal. This requirement is no longer applicable because the source can limit PM₁₀

emissions to less than one hundred (100) tons per year without limiting the PM₁₀ emissions from the two (2) tool sharpening areas. Thus, Condition D.3.2 of F 065-5619 is hereby rescinded.

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.5 Particulate Control

In order to comply with Condition D.3.1, the rotoclones for particulate control shall be in operation and control emissions from the two (2) tool sharpening areas (N-20 and N-21) at all times that the two (2) tool sharpening areas (N-20 and N-21) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of each exhaust (Stack 31 and Stack 32) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.7 Rotoclone Inspections

An inspection shall be performed each calendar quarter of all rotoclones controlling the two (2) tool sharpening areas (N-20 and N-21) when venting to the atmosphere. A rotoclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.3.8 Rotoclone Failure Detection

In the event that rotoclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of each exhaust (Stack 31 and Stack 32) once per shift when venting to the atmosphere.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.[326 IAC 6-3-2]
- (c) Quenching operations used with heat treating processes.[326 IAC 6-3-2]
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Lime silo (N-28), associated with the onsite WWTP. [326 IAC 6-3-2]
- (f) Forge/press shop QA/QC grinders (N-56 and N-57).[326 IAC 6-3-2]
- (g) Wet type machining operations. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the brazing, cutting, soldering, welding, quenching, grinding, machining operations as well as the loading and unloading of lime silo, N-28, shall not exceed the allowable particulate emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

If the process weight rate is less than one hundred pounds per hour, then the allowable particulate emission rate shall be 0.551 pounds per hour.

- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the 77 wet machines and the one (1) heat treat furnace shall not exceed the allowable particulate emission rate listed in the following table:

Facility	Process Weight Rate (tons/hour)	Allowable PM Emission Rate (pounds/hour)
77 Wet Machines	1.50 each	5.38 each
1 Heat Treat Furnace	1.50	5.38

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Address: 1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP No.: 065-14159-00001

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
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**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Address: 1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP No.: 065-14159-00001

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

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Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Address: 1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP No.: 065-14159-00001

9	Natural Gas Only
9	Alternate Fuel burned
From: _____	To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

A certification by the authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Address: 1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP No.: 065-14159-00001
Facilities: Three (3) boilers, identified as B-1, B-2 and B-3
Parameter: Amount of No.2 fuel oil burned
Limit: Less than 1,000,000 gallons of No.2 oil per twelve (12) consecutive month period, with compliance determined at the end of each month, equivalent to SO₂ emissions less than 35.5 tons per year.

YEAR: _____

Month	Gallons of No.2 oil burned	Gallons of No.2 oil burned	Gallons of No.2 oil burned
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Address: 1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP No.: 065-14159-00001

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Location: 1817 "I" Avenue, New Castle, Indiana 47362
County: Henry
FESOP: F 065-14159-00001
SIC Code: 3714
Permit Reviewer: Edward A. Longenberger

On October 11, 2002, the Office of Air Quality (OAQ) had a notice published in the Courier Times, New Castle, Indiana, stating that DaimlerChrysler Corporation New Castle Machining & Forge Plant had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate stationary automotive parts manufacturing source with baghouses for particulate control. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

On November 13, 2002, Kelly L. Cartwright of DaimlerChrysler Corporation New Castle Machining & Forge Plant submitted comments on the proposed FESOP renewal. The comments are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Comment 1:

The visible emission (VE) compliance monitoring requirements in Sections D.2 and D.3 of the FESOP renewal have been unnecessarily increased from the original FESOP. The original FESOP required that daily VE notations be performed during normal daylight operations. However, the FESOP renewal requires that VE notations be performed once per shift during normal daylight operations. Specifically, these requirements have been modified in sections D.2.6 (shotblasting stack exhausts) and D.3.6 (tool sharpening areas). DaimlerChrysler requests that the original FESOP monitoring frequency of once per day be maintained based on the following:

In the June 7, 2002 correspondence, NCM&F submitted daily VE observation records for the past five years. These records demonstrated that there were no such visible emissions for shotblasting and tool sharpening sources for the past five years. Emissions from such units are unlikely to fluctuate significantly from shift to shift. As previously commented, to increase the frequency of periodic monitoring for sources that have historically shown no problems, is counterproductive and in direct contrast to the purpose and intent of the Title V program and the subsequent White Papers issued by EPA. Furthermore, NCM&F would assume added administrative and financial burdens imposed by increased VE observation requirements. The additional burdens placed on NCM&F would not contribute to a reduction in emissions or enhancement of the existing compliance monitoring methods, and therefore, there will be no environmental benefits realized due to the increased VE observation requirements. NCM&F requests that IDEM provide the basis as to why monitoring frequency would need to be increased for the types of sources operated by NCM&F when they have been sufficient since the issuance of the original FESOP in December of 1996.

Response 1:

IDEM, OAQ, has determined that daily compliance monitoring is not sufficient to monitor continuous compliance with the applicable rules for these types of operations. Baghouse failure can occur suddenly, and the OAQ believes that visible emissions notations once per operating shift are a reasonable requirement. OAQ requires each shift manager to be responsible for compliance monitoring. Therefore, visible emissions are required once per shift in the proposed permit. No change to the permit is made as a result of this comment.

Comment 2:

The draft FESOP renewal also includes an added monitoring requirement for the shotblasting operations. Section D.2.7 requires NCM&F to record the total static pressure drop across the baghouses used in conjunction with the shotblasting operations, at least once per shift when the shotblasting operations are in operation when venting to the atmosphere. This requirement did not previously exist in the original FESOP issuance or the most recent permit revision No. 065-13804-00001, as issued on June 4, 2001. NCM&F requests that IDEM explain why an additional monitoring requirement (i.e., to record pressure drop for the baghouse control devices related to shotblasting operations) is required when the existing monitoring has been sufficient for the past six years.

DaimlerChrysler believes the addition of pressure drop monitoring for two (2) shotblasting operations does not enhance the ability of the FESOP to assure compliance, particularly given the compliance history of shotblasting units at NCM&F. Testing for the shotblasting units at NCM&F have historically demonstrated compliance with particulate matter (PM) emission limitations. Furthermore, baghouse inspections are required each calendar quarter for all shotblasting operations. Also, PM and PM10 testing is required every five years, including once prior to November 1, 2005. Given the presence of inspection, testing and VE requirements, NCM&F requests that the monitoring requirement specified in Section D.2.7 be removed. The addition of this requirement would also result in an increase in manpower at NCM&F, and corresponding increase in costs to the facility, without providing a direct benefit to the environment.

Response 2:

The pressure drop monitoring is used to indicate compliance with 326 IAC 6 and 326 IAC 2-8. The baghouses controlling N-3 and N-22 must achieve 94% and 90% control efficiency, respectively, in order to comply with the permit requirements. The pressure drop requirement is designed as a trigger that the source perform some corrective action on the facility if the pressure drop is abnormal, to ensure continuous compliance with emission limitations. No change to the permit is made as a result of this comment.

Comment 3:

Section D.2.4 requires PM and PM10 testing utilizing methods as approved by the Commissioner. The requirement further states that testing of PM10 "includes filterable and condensable PM10." NCM&F requests that the phrase "includes filterable and condensable PM10" be removed from D.2.4. The language could be interpreted as requiring the use of USEPA Reference Methods 5 and 202. IDEM has recently determined that Method 5 may be appropriate by itself to demonstrate compliance with PM10 limitations. Therefore, NCM&F should not be constricted by the specific language, as there is not an underlying requirement for use of Method 202 within the applicable regulations. Rather, it is up to the source and IDEM to determine the appropriate test protocol for the required emissions testing.

Response 3:

Condition D.2.4 requires PM and PM₁₀ testing of the two (2) shotblasting operations (N-3 and N-22) to determine compliance with 326 IAC 6-3-2 and 326 IAC 2-8-4. Condensible PM₁₀ is not likely to be produced by shot blasting operations, therefore, the sentence is removed:

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Prior to November 1, 2005, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM₁₀ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~PM₁₀ includes filterable and condensible PM₁₀.~~ Testing shall be conducted in accordance with Section C- Performance Testing.

Upon further review, the OAQ has decided to make the following changes to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

The general provisions; term of permit rule cite was added to Condition B.3 (Permit Term). In order to clarify the permit term for renewals, the following change has been made:

B.3 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date of **this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Change 2:

Since Condition B.8(c) (Duty to Supplement and Provide Information) already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity. Also, the condition was revised to change a rule reference. Paragraph (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added. Changes are as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.~~ [326 IAC 2-8-4(5)(E)]
- (c) **For information furnished by the Permittee to IDEM, OAQ,** the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Change 3:

The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from Condition B.15 to Condition B.14. In Condition B.14 (Emergency Provisions), the statement at the end of (b)(4) has been removed because it is already stated in (f). Changes are as follows:

B.14 Emergency Provisions [326 IAC 2-8-12]

(b) (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

~~Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

(h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

Change 4:

Condition B.15(c) (Deviations from Permit Requirements and Conditions), has been deleted and was incorporated as Condition B.14(h) (Emergency Provisions).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

~~(c) — Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

Change 5:

Condition B.18 (Permit Amendment or Revision) has been revised to replace “should” with “shall” in (b) as follows:

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Change 6:

In order to be consistent with 326 IAC 2-8-15 (a)(5), the rule cite has been revised in Condition B.19(a)(5) B.19 (Operational Flexibility). Condition B.19(b) has been removed, because this is a Part 70 requirement, but not a FESOP requirement.

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- ~~(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

~~(1) A brief description of the change within the source;~~

~~(2) The date on which the change will occur;~~

~~(3) Any change in emissions; and~~

~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

Change 7:

In Condition B.22 (c) (Transfer of Ownership or Operational Control), the rule cite has been corrected as follows.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11 10(b)(3)]

Change 8:

326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to Condition B.23. Also, the section and phone number of the department that the Permittee can contact has been corrected in Condition B.23(c) as follows:

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4320** (ask for OAQ, ~~Technical Support and Modeling Section~~ **I/M & Billing Section**), to determine the appropriate permit fee.

Change 9:

Condition C.1 (Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) has been added to the FESOP as follows. All remaining Section C conditions have been renumbered.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

Change 10:

Condition C.8(e), now C.9(e), (Asbestos Abatement Projects) has been revised to correct the rule cite as follows:

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~41~~, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

Change 11:

The following was added to Condition C.10 (now C.11) (Compliance Requirements) to state what IDEM, OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements as follows:

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Change 12:

Condition C.13(c), now C.14(c), was added to address pH better and removed pH from (b) as follows:

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (b) Whenever a condition in this permit requires the measurement of a temperature, ~~or flow rate, or pH level,~~ the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) **The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.**
- ~~(e)-(d)~~ The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Change 13:

In Condition C.16(e), now C.17(e), (Compliance Response Plan - Preparation, Implementation, Records, and Reports), the rule cite was corrected to reflect the FESOP rules instead of the Title V rules.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of ~~326 IAC 2-7-16~~ **326 IAC 2-8-12** (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

Change 14:

Condition C.19(d), now C.20, (General Reporting Requirements) has been revised to indicate all forms as follows:

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all reports** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The reports do~~ **All reports do** require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 15:

Previously, the terms "particulate" and "particulate matter" were both used in the 326 IAC 6-3, but revisions were made to the rule which became effective on June 12, 2002 that included using the term "particulate" consistently in 326 IAC 6-3. Therefore, Conditions D.2.5 and D.3.5 have been changed as follows:

D.2.5 Particulate Matter (PM) Control

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for **PM particulate** and PM10 control shall be in operation and control emissions from the two (2) shot blasting operations (N-3 and N-22) at all times that the two (2) shot blasting operations (N-3 and N-22) are in operation.

D.3.5 Particulate ~~Matter (PM)~~ Control

In order to comply with Condition D.3.1, the rotoclones for **PM particulate** control shall be in operation and control emissions from the two (2) tool sharpening areas (N-20 and N-21) at all times that the two (2) tool sharpening areas (N-20 and N-21) are in operation.

Change 16:

Condition D.2.9 (Broken or Failed Bag Detection) was revised as follows to describe when a failed unit will be shut down:

D.2.9 Broken or Failed Bag Detection

- (b) For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then** failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Change 17:

In order to be consistent with the Parametric Monitoring condition, Condition D.2.10 was revised to record "total static pressure drop".

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of each shot blast stack exhaust once per shift when venting to the atmosphere.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
 - (1) Once per shift records of the ~~following operational parameters~~ **total static pressure drop** during normal operation when venting to the atmosphere: ~~differential pressure~~.

Change 18:

Condition D.1.3 was revised to remove "Matter" and "PM" from this condition, because 326 IAC 6-2 is for Particulate Emissions not Particulate Matter Emissions:

D.1.3 Particulate ~~Matter~~ Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983), particulate emissions from the three boilers, identified as B-1, B-2 and B-3, shall in no case exceed 0.323 pounds of particulate matter per million British thermal units heat input.

Change 19:

The first sentence of the Quarterly Deviation and Compliance Monitoring Report has been removed, because it posed a conflict with the provisions that required an annual certification as follows:

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Change 20:

In the Emergency Occurrence Report form, the first box on was revised to include the word "working" in order to be consistent with 326 IAC 2-8-12(b)(5) and the Emergency Provision as follows:

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- Ⓒ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - Ⓒ The Permittee must submit notice in writing or by facsimile within two (2) **working** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

Change 21:

The Natural Gas-Fired Boiler Certification has had the following wording changed as follows:

~~Attach a signed certification to complete this report.~~ **A certification by the authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.**

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	DaimlerChrysler Corporation New Castle Machining & Forge Plant
Source Location:	1817 "I" Avenue, New Castle, Indiana 47362
County:	Henry
SIC Code:	3714
Operation Permit No.:	F 065-14159-00001
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from DaimlerChrysler Corporation New Castle Machining & Forge Plant relating to the operation of an automotive parts manufacturing source. DaimlerChrysler Corporation New Castle Machining & Forge Plant was issued FESOP 065-5619-00001 on December 11, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) boilers, firing natural gas, using No.2 fuel oil as backup, identified as B-1, B-2 and B-3, installed in 1999, rated at 36 million British thermal units per hour, each.
- (b) One (1) shot blasting operation, identified as N-3, installed in 1973, equipped with a baghouse, exhausting through Stack 500, capacity: 5,762 pounds of metal parts per hour.
- (c) One (1) shot blasting operation, identified as N-22, installed in 1994, equipped with a baghouse, exhausting through Stack 22, capacity: 4,276 pounds of metal parts per hour.
- (d) Two (2) tool sharpening areas, identified as N-20 and N-21, installed in 1940, equipped with two (2) rotoclones, exhausting through Stacks 31 and 32, capacity: 94 pounds per hour, each.
- (e) One (1) piston pin packer, identified as N-31, installed in 1986, consisting of four (4) sub-stations, exhausting through Stack 20, capacity: 2,500 parts per hour.
- (f) One (1) parts washer, identified as N-32, installed in 1988, exhausting through Stack 6, capacity: 0.2 gallons per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.[326 IAC 6-3-2]
- (c) Quenching operations used with heat treating processes.[326 IAC 6-3-2]
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Lime silo (N-28), associated with the onsite WWTP. [326 IAC 6-3-2]
- (f) Forge/press shop QA/QC grinders (N-56 and N-57).[326 IAC 6-3-2]
- (g) Wet type machining operations. [326 IAC 6-3-2]
- (h) Natural gas-fired combustion sources, each rated at less than ten million (10,000,000) Btu per hour, total rating: 23.6 million British thermal units per hour.
- (i) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (j) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (k) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (l) Refractory storage not requiring air pollution control equipment.
- (m) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (n) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (o) Cleaners and solvents characterized as follows: 1) having a vapor pressure equal to or less than 2 kilopascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or; 2) having a vapor pressure equal to or less than 0.7 kilopascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured

at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (p) Closed loop heating and cooling systems.
- (q) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (r) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (s) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (t) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (u) Heat exchanger cleaning and repair.
- (v) Process vessel degreasing and cleaning to prepare for internal repairs.
- (w) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (x) Paved and unpaved roads and parking lots with public access.
- (y) Asbestos abatement projects regulated by 326 IAC 14-10.
- (z) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (aa) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (bb) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (cc) Stationary fire pumps.
- (dd) Various waterbased parts washers (approximately 59 individual units) are utilized throughout the facility. The individual potential to emit (PTE) for glycol ethers is approximately 0.1 pounds per day. The combined PTE for glycol ethers is approximately 5.2 pounds per day.
- (ee) Lead die cast operation (N-13), associated with die repair.
- (ff) Shift tube adhesive operation (N-19).
- (gg) Parts marking (N-30) occurs at numerous locations around the plant.
- (hh) Various water based parts washers, approximately 30 units (N-41), are used throughout the plant.

Existing Approvals

The source has been operating under the following previous approvals including:

- (a) FESOP 065-5619-00001, issued on December 11, 1996;
- (b) SPR 065-11005-00001, issued on October 7, 1999;
- (c) AAF 065-12797-00001, issued on November 9, 2000;
- (d) MPM 065-12960-00001, issued on January 18, 2001;
- (e) SPR 065-13804-00001, issued on June 4, 2001;
- (f) AAF 065-14915-00001, issued October 2, 2001; and
- (g) AAF 065-14583-00001, issued November 1, 2001.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this permit:

- (a) FESOP 065-5619-00001, issued on December 11, 1996

Condition D.1.1, the requirement to limit natural gas usage to less than 900 million cubic feet per year, and Condition D.1.7, the requirement to limit emissions of NO_x to less than 73.0 tons per year.

Reason not incorporated: the source has removed all boilers except B-1, B-2 and B-3, and according to the latest AP-42 emission factors for NO_x emissions from natural gas combustion, the unrestricted potential to emit NO_x when burning natural gas is only 47.3 tons per year.

- (b) FESOP 065-5619-00001, issued on December 11, 1996

Condition D.3.2, which limited PM₁₀ emissions from the two (2) tool sharpening areas to less than 0.307 tons per month.

Reason not incorporated: the source can limit PM₁₀ emissions to less than one hundred (100) tons per year without limiting the PM₁₀ emissions from the two (2) tool sharpening areas.

- (c) FESOP 065-5619-00001, issued on December 11, 1996

The PM₁₀ limits in Condition D.2.2 were changed as follows: The limit on N-3 was changed from 4.50 to 12.86 pounds per hour, and the limit on N-22 was changed from 1.84 to 5.25 pounds per hour because the former limits were found to be too restrictive. These limits will assure that emissions of PM₁₀ from the entire source will be limited to less than one hundred (100) tons per year.

The following terms and conditions from previous approvals have been determined to be no longer applicable, and, therefore, are not incorporated into this permit:

FESOP 065-5619-00001, issued on December 11, 1996

Conditions D.4.1, D.4.2, D.4.3, D.4.4, and D.4.5, concerning the maintenance paint booth (N-26).

Reason not incorporated: Pursuant to 326 IAC 2-7-1(40), the maintenance paint booth, identified as N-26, meets the definition of a "trivial activity" under 326 IAC 2-7-1(40)(E) since it is an activity related to routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process. Therefore, this booth will not be listed in the operating permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 13, 2001.

Emission Calculations

The potential emissions from the parts washer (N-32) and the tool sharpening (N-20 and N-21) are shown below. See pages 1 through 7 of 7 of Appendix A of this document for detailed emissions calculations for the other significant emission units.

- (a) The potential VOC emissions from the parts washer (N-32) are:

VOC emissions = 0.2 gal of solvent/hr (100% VOC) x 6.8 lbs/gal = 1.36 lbs/hr = 5.96 tons/yr.

- (b) Potential emissions for tool sharpening (N-20 and N-21) controlled by Rotoclones with 90% efficiency:

PM emissions before controls:

PM = 2.12 gal/wk x 1 wk/40 hrs x 52 lbs/gal (density of material)

PM = 2.76 lbs per hour = 12.1 tons per year

PM emissions after controls:

PM = (1 - 0.90) x 12.1 tons per year = 0.121 tons per year

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	801
PM ₁₀	801
SO ₂	240
VOC	25.4
CO	48.4
NO _x	67.9

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Arsenic	0.002
Beryllium	0.001
Benzene	0.001
Dichlorobenzene	0.0006
Formaldehyde	0.035
Hexane	0.851
Toluene	0.002
Lead Compounds	0.004
Cadmium Compounds	0.001
Chromium Compounds	0.001
Manganese Compounds	0.003
Mercury	0.001
Nickel Compounds	0.001
Selenium	0.007
Glycol Ethers	0.949
TOTAL	1.86

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ and SO₂ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 11, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM ^(a)	PM ₁₀ ^(b)	SO ₂	VOC	CO	NO _x	HAPs
Boilers (B-1, B-2 and B-3)	1.00	3.59	35.5	2.60	39.7	47.3	0.893
Shotblaster (N-3)	36.5	56.3	-	-	-	-	-
Shotblaster (N-22)	29.9	23.0	-	-	-	-	-
Tool Sharpening (N-20 and N-21)	7.37	12.1	-	-	-	-	-
Piston Packing (N-31)	-	-	-	11.8	-	-	-
Parts Washer (N-32)	-	-	-	5.96	-	-	-
Insignificant Activities	5.00	5.00	0.062	5.00	8.68	10.34	0.195
Total PTE After Issuance	79.8	Less than 100	35.6	25.4	48.4	57.6	Single less than 10 Total less than 25

- (a) In the above table, PM values for N-3, N-22, N-20 and N-21 represent allowable emissions pursuant to 326 IAC 6-3-2.
- (b) In the above table, PM₁₀ values for N-20 and N-21 represent the unrestricted potential to emit.

- (c) The PM₁₀ limits for the two (2) shotblasting units (N-3 and N-22) were calculated by assigning the remainder of the allowable PM₁₀ after considering potential emissions from the remaining emission units at this source, including insignificant activities. The limit for each shotblaster was calculated based on the ratio of their potential to emit:

N-3 is 71% of total shotblaster PTE
N-22 is 29% of total shotblaster PTE

N-3 PM₁₀ limit: 79.3 tons/yr x 0.71 = 56.3 tons/yr = 12.86 lb/hr
N-22 PM₁₀ limit: 79.3 tons/yr x 0.29 = 23.0 tons/yr = 5.25 lb/hr

County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The three (3) boilers, firing natural gas, and using No.2 fuel oil as backup, identified as B-1, B-2 and B-3, are still subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc), because each boiler has a heat input capacity greater than ten (10) million British thermal units per hour but less than one hundred (100) million British thermal units per hour, and each boiler was installed after June 9, 1989.

Pursuant to 40 CFR 60.42c (d), no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 0.5 lb/MMBTU heat input or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur.

Pursuant to 40 CFR 60.43c (c), no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 30 million BTU/hr or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6 minute average), except for one 6 minute period per hour of not more than 27 percent opacity.

Pursuant to 40 CFR 60.48c (a), the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual

startup, as provided by Section 60.7 of this part. This notification shall include:

- (1) the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility,
- (2) if applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 60.42c or 60.43c,
- (3) the annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired,
- (4) notification if an emerging technology will be used for controlling SO₂ emissions.

Pursuant to 40 CFR 60.48c (g), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during the day.

Pursuant to 40 CFR 60.48c (i), all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (c) The parts washer (N-32), and the degreasing operations, deemed an insignificant activity, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) since no halogenated HAP solvents are used.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. The two (2) tool sharpening areas, identified as N-20 and N-21, and the one (1) shot blasting operation, identified as N-3, were constructed prior to the PSD applicability date of August 7, 1977. The potential to emit of PM and PM₁₀ after controls for these emission units would have been less than 250 tons per year. The potential to emit of each modification after 1977 as well as the total source potential to emit after each modification would have been less than 250 tons per year, making each addition a minor modification to an existing minor source.

Currently, the unrestricted potential to emit of SO₂, VOC, NO_x and CO are each less than 250 tons per year. The limited potential to emit of PM and PM₁₀ are each less than 250 tons per year. PM emissions are limited by 326 IAC 6-3-2, and PM₁₀ emissions are limited by the requirements of 326 IAC 2-8-4. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply, and this source is a minor source with respect to this rule.

326 IAC 2-6 (Emission Reporting)

This source is located in Henry County and the potential to emit NO_x, CO and VOC is less than one hundred (100) tons per year. The emissions of PM₁₀ and SO₂ are limited to less than one hundred (100) tons per year. Therefore 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM_{10} and SO_2 shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) The applicant has accepted a total No.2 fuel oil limit to the three (3) boilers, identified as B-1, B-2 and B-3, of less than 1,000,000 gallons per year which is equivalent to SO_2 emissions less than 35.5 tons per year.
- (b) Pursuant to 326 IAC 2-8-4, the PM_{10} from the one (1) shot blasting operation, identified as N-3, shall be limited to less than 12.86 pounds per hour, equivalent to less than 56.3 tons per year.

The baghouse for PM_{10} control shall be in operation and control emissions from the one (1) shot blasting operation, identified as N-3, at all times that the one (1) shot blasting operation, identified as N-3, is in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 2-8-4, the PM_{10} from the one (1) shot blasting operation, identified as N-22, shall be limited to less than 5.25 pounds per hour, equivalent to less than 23.0 tons per year.

The baghouse for PM_{10} control shall be in operation and control emissions from the one (1) shot blasting operation, identified as N-22, at all times that the one (1) shot blasting operation, identified as N-22, is in operation, in order to comply with this limit.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The three (3) boilers, identified as B-1, B-2, and B-3, installed in 1999, each with a heat input capacity of 36 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For the three (3) boilers:

$$Pt = 1.09 / (108)^{0.26} = 0.323 \text{ lb/MMBtu heat input}$$

Based on Appendix A, the worst-case potential to emit of PM from the three (3) boilers, is 6.76 tons per year.

$$6.76 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 1.54 \text{ lb/hr}$$
$$(1.54 \text{ lb/hr} / 108 \text{ MMBtu/hr}) = 0.143 \text{ lb PM per MMBtu}$$

Therefore, the three (3) boilers, identified as B-1, B-2 and B-3, will comply with this rule.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate from the one (1) shot blasting operation, identified as N-3, shall not exceed 8.33 pounds per hour when operating at a process weight rate of 5,762 pounds per hour.

The baghouse for PM control shall be in operation and control emissions from the one (1) shot blasting operation, identified as N-3, at all times that the one (1) shot blasting operation, identified as N-3, is in operation, in order to comply with this rule. The PM emissions from the one (1) shot blasting operation, identified as N-3, after controls are 1.26 pounds per hour which is less than the allowable PM emission rate of 8.33 pounds per hour.

- (b) Pursuant to 326 IAC 6-3-2(e), the particulate from the one (1) shot blasting operation, identified as N-22, shall not exceed 6.82 pounds per hour when operating at a process weight rate of 4,276 pounds per hour.

The baghouse for PM control shall be in operation and control emissions from the one (1) shot blasting operation, identified as N-22, at all times that the one (1) shot blasting operation, identified as N-22, is in operation, in order to comply with this rule. The PM emissions from the one (1) shot blasting operation, identified as N-22, after controls are 0.515 pounds per hour which is less than the allowable PM emission rate of 6.82 pounds per hour.

- (c) Pursuant to 326 IAC 6-3-2(e), the total particulate from the two (2) tool sharpening areas, identified as N-20 and N-21, shall not exceed 0.841 pounds per hour when operating at a total process weight rate of 188 pounds per hour.

The two (2) rotoclones for PM control shall be in operation and control emissions from the two (2) tool sharpening areas, identified as N-20 and N-21, at all times that the two (2) tool sharpening areas, identified as N-20 and N-21, are in operation, in order to comply with this rule. The PM emissions from the two (2) tool sharpening areas, identified as N-20 and N-21, after controls are 0.276 pounds per hour which is less than the allowable PM emission rate of 0.841 pounds per hour.

- (d) The above limitations are based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Since the three (3) boilers, identified as B-1, B-2 and B-3, each have a potential to emit twenty-five (25) tons per year of SO₂, they are subject to the requirements of 326 IAC 7-1.1. Pursuant to this rule, sulfur dioxide emissions from fuel combustion facilities shall be limited to five-tenths (0.5) pounds per million British thermal units for distillate oil combustion.

The emissions based upon the emission factors for oil firing are:

$$(240 \text{ ton SO}_2/\text{yr})(1 \text{ yr}/8760 \text{ hr})(1 \text{ hr}/108 \text{ MMBtu})(2000 \text{ lb}/1 \text{ ton}) = 0.5 \text{ lb SO}_2/\text{MMBtu}$$

Therefore, the three (3) boilers, identified as B-1, B-2 and B-3, will comply with this rule.

326 IAC 7-2-1 (Sulfur Dioxide Compliance: reporting and methods to determine compliance)

Reports of calendar month or annual average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate shall be provided upon request to the Office of Air Quality.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This rule does not apply to the piston pin packing operation (N-31) since it was installed in 1986 and the potential VOC emissions are less than twenty-five (25) tons per year.

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, (parts washer N-32, installed in 1988) the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate from the brazing, cutting, soldering, welding, quenching, grinding, machining operations as well as the loading and unloading of lime silo, N-28, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

If the process weight rate is less than one hundred pounds per hour, then the allowable particulate emission rate shall be 0.551 pounds per hour.

- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate from the 77 wet machines and the one (1) heat treat furnace shall not exceed the particulate emission rate listed in the following table:

Facility	Process Weight Rate (tons/hour)	Allowable PM Emission Rate (pounds/hour)
77 Wet Machines	1.50 each	5.38 each
1 Heat Treat Furnace	1.50	5.38

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaner degreaser operations do not have a remote solvent reservoir and therefore are subject to the requirements of 326 IAC 8-3-5.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S.

EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

- (a) All testing requirements from previous approvals were incorporated into this FESOP except the following:

FESOP 065-5619-00001 required NO_x testing of the 250 million British thermal units per hour boiler to verify the emission factor. This boiler has been removed.
- (b) PM and PM₁₀ testing of the two (2) shot blasting operations (N-3 and N-22) was performed on November 1, 2000. The test showed that the shot blasting operations were in compliance with all applicable requirements. The test shall be repeated prior to November 1, 2005.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The three (3) boilers, identified as B-1, B-2 and B-3, have applicable compliance monitoring conditions as specified below:

Visible emission notations of the boiler stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and burning oil. A

trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the boilers must operate properly to ensure compliance with 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983), 40 CFR 60 Subpart Dc, and 326 IAC 2-8 (FESOP).

- (b) The two (2) shot blast operations, identified as N-3 and N-22, have applicable compliance monitoring conditions as specified below:
 - (1) Visible emission notations of each shot blast exhaust (Stack 500 and Stack 22) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the shotblasting operations (N-3 and N-22), at least once per shift when the shotblasting operations (N-3 and N-22) are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports.
 - (3) An inspection shall be performed each calendar quarter of all bags controlling the shotblasting operations when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
 - (4) In the event that bag failure has been observed:
 - (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this proposed permit (Section B- Emergency Provisions).

Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the shotblasting operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

- (c) The two (2) tool sharpening areas, identified as N-20 and N-21, have applicable compliance monitoring conditions as specified below:

- (1) Visible emission notations of each exhaust (Stack 31 and Stack 32) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (2) An inspection shall be performed each calendar quarter of all rotoclones controlling the two (2) tool sharpening areas when venting to the atmosphere. A rotoclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

- (3) In the event that rotoclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the rotoclones for the two (2) tool sharpening areas must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this automotive parts manufacturing source shall be subject to the conditions of the attached proposed **FESOP No.: F 065-14159-00001**.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001

Heat Input Capacity
MMBtu/hr

108

Potential Throughput
kgals/year

6757.71429

S = Weight % Sulfur

0.5

Unit ID	Rating
	(MMBtu/hr)
B-1	36.000
B-2	36.000
B-3	36.000
Total	108.000

Emission Factor in lb/kgal	Pollutant				
	PM*	SO ₂	NO _x	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	6.76	239.9	67.6	1.1	16.9

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

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Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.89E-03	1.42E-03	1.42E-03	1.42E-03	4.26E-03

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05	Total HAPs
Potential Emission in tons/yr	1.42E-03	2.84E-03	1.42E-03	7.10E-03	2.32E-02

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001

Unit ID	Rating
	(MMBtu/hr)
B-1	36.000
B-2	36.000
B-3	36.000
Total	108.000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

108.000

946.08

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.899	3.60	0.284	47.3	2.602	39.74

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions****Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant****Address City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362****FESOP: F 065-14159****Plt ID: 065-00001****Reviewer: Edward A. Longenberger****Date: March 13, 2001****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.934E-04	5.676E-04	3.548E-02	8.515E-01	1.608E-03

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	2.365E-04	5.203E-04	6.623E-04	1.798E-04	9.934E-04	0.893

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Shot Blast Emissions
N-3 and N-22**

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Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001

Unit ID	Capacity (lbs/hr)	Shot Used (hopper/wk)	Shot Used (hopper/hr)	Hopper Size (ft^3)	Shot Density (lbs/ft^3)	Potential PM (lbs/hr)	Potential PM (tons/yr)	Control Eff (%)	Potential PM After Control (lbs/hr)	Potential PM After Control (tons/yr)
N-3	5,762	0.96	0.024	13.5	389	126.04	552	0.99	1.26	5.52
N-22	4,276	0.72	0.018	7.35	389	51.48	225	0.99	0.515	2.25
Total						178	778		1.78	7.78

Methodology

Data from SPR 065-13804-00001

Potential PM (lbs/hr) = Shot Used (hopper/hr) x Hopper Size (ft^3) x Shot Density (lbs/ft^3)

Potential PM (tons/yr) = Potential PM (lbs/hr) x 8760 hrs/yr / 2000 lbs/ton

PM equal to PM10 in this case

Baghouse Efficiency 99%

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

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**Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
N-31 Piston Packing																
Rust Preventative	6.60	81.70%	0.0%	81.7%	0.0%	15.00%	0.00020	2500.000	5.39	5.39	2.70	64.71	11.81	0.00	35.95	100%
PM									Control Efficiency	0.00%						
State Potential Emissions									Uncontrolled		2.70	64.7	11.8	0.00		
Add worst case coating to all solvents									Controlled		2.70	64.7	11.8	0.00		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

* For N-26: PTE based on worst-case enamel

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Activities**

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**Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

23.600

206.74

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx	VOC 5.5	CO 84.0
				100.0 **see below		
Potential Emission in tons/yr	0.196	0.79	0.062	10.3	0.569	8.68

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 8 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Activities
HAPs Emissions

Page 8 of 9 TSD App A

Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.171E-04	1.240E-04	7.753E-03	1.861E-01	3.515E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	5.168E-05	1.137E-04	1.447E-04	3.928E-05	2.171E-04	0.195

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Company Name: DaimlerChrysler Corporation New Castle Machining & Forge Plant
Address, City IN Zip: 1817 "I" Avenue, New Castle, Indiana 47362
FESOP: F 065-14159
Plt ID: 065-00001
Reviewer: Edward A. Longenberger
Date: March 13, 2001

Total Source Emissions Summary

Emissions before controls

Emission Unit	PM Potential Emission (tons/yr)	PM-10 Potential Emission (tons/yr)	SO2 Potential Emission (tons/yr)	NOx Potential Emission (tons/yr)	VOC Potential Emission (tons/yr)	CO Potential Emission (tons/yr)
Boilers (B-1, B-2 and B-3)	6.760	6.760	239.900	67.600	2.602	39.740
Shotblaster (N-3)	552.000	552.000	0.000	0.000	0.000	0.000
Tool Sharpening (N-20 and N-21)	12.100	12.100	0.000	0.000	0.000	0.000
Shotblaster (N-22)	225.000	225.000	0.000	0.000	0.000	0.000
Piston Packing (N-31)	0.000	0.000	0.000	0.000	11.800	0.000
Parts Washer (N-32)	0.000	0.000	0.000	0.000	5.960	0.000
Insignificant Activities	5.000	5.000	0.062	10.340	5.000	8.680
Total	801	801	240	77.9	25.4	48.4

Emissions after controls and fuel limit

Emission Unit	PM Potential Emission (tons/yr)	PM-10 Potential Emission (tons/yr)	SO2 Potential Emission (tons/yr)	NOx Potential Emission (tons/yr)	VOC Potential Emission (tons/yr)	CO Potential Emission (tons/yr)
Boilers (B-1, B-2 and B-3)	1.000	3.595	35.500	47.300	2.602	39.740
Shotblaster (N-3)	5.520	5.520	0.000	0.000	0.000	0.000
Tool Sharpening (N-20 and N-21)	0.121	0.121	0.000	0.000	0.000	0.000
Shotblaster (N-22)	2.250	2.250	0.000	0.000	0.000	0.000
Piston Packing (N-31)	0.000	0.000	0.000	0.000	11.800	0.000
Parts Washer (N-32)	0.000	0.000	0.000	0.000	5.960	0.000
Insignificant Activities	5.000	5.000	0.062	10.340	5.000	8.680
Total	13.9	16.5	35.6	57.6	25.4	48.4